

**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

NOV 03 2017

DAVID CREWS, CLERK  
BY Deputy Deputy

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 3:17-CR-110-MPM-RP

MARIO D. COLLINS  
PAULETTE M. CLAYTON

18 U.S.C. § 2  
18 U.S.C. § 924(c)(1)(A)(ii)  
18 U.S.C. § 1201(c)  
18 U.S.C. § 1594(c)  
18 U.S.C. § 2421

**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**(Conspiracy to Commit Sex Trafficking)**

1. From on or about April 26, 2017 to on or about April 27, 2017, in the Northern District of Mississippi and elsewhere, defendants MARIO D. COLLINS and PAULETTE M. CLAYTON, and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other, in and affecting interstate commerce, to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained the following individual, Victim 1 ("O.V."), knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 1 to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591 (a)(1) and (b)(1).

**Manner and Means**

2. It was part of the conspiracy that PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, received monies and other things of value by having Victim 1 engage in commercial sex acts.

3. It was further part of the conspiracy that MARIO D. COLLINS and PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, transported and arranged for the transportation of Victim 1 from Atlanta, Georgia to Memphis, Tennessee and then to Oxford, Mississippi in order for Victim 1 to engage in commercial sex acts.

4. It was further part of the conspiracy that MARIO D. COLLINS and PAULETTE M. CLAYTON used violence and the threat of violence to prevent Victim 1 from escaping the trip to Oxford, Mississippi.

5. It was further part of the conspiracy that PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, used vehicles, public highways, hotels, telephones and the internet to facilitate the commercial sex acts.

**Overt Acts**

6. During and in furtherance of the conspiracy and to affect the objects of the conspiracy, at least one of the co-conspirators committed at least one of the following overt acts on or about the dates listed.:

a. On or about April 26, 2017, PAULETTE M. CLAYTON purchased a bus ticket for Victim 1 to travel from Atlanta, Georgia to Memphis, Tennessee.

b. On or about April 27, 2017, PAULETTE M. CLAYTON posted pictures of Victim 1 on [www.backpage.com](http://www.backpage.com) advertising commercial sex with Victim 1.

c. On or about April 27, 2017, MARIO D. COLLINS met PAULETTE M. CLAYTON and Victim 1 in order to transport them to Oxford, Mississippi in his vehicle.

d. On or about April 27, 2017, during the trip to Oxford, Mississippi, Victim 1 objected to performing commercial sex acts and asked to be taken home. In response to Victim 1's request to be taken home, PAULETTE M. CLAYTON threatened to throw Victim 1 out of the vehicle and run her over.

e. On or about April 27, 2017, during the trip to Oxford, Mississippi, Victim 1 objected to performing commercial sex acts and asked to be taken home. In response to Victim 1's request to be taken home, MARIO D. COLLINS placed a gun to Victim 1's head and threatened Victim 1.

f. On or about April 27, 2017, PAULETTE M CLAYTON rented a room at the University Inn in Oxford, Mississippi in order for Victim 1 to engage in commercial sex acts. All in violation of Title 18, United States Code, Section 1594(c).

**COUNT TWO**

**(Conspiracy to Commit Kidnapping)**

1. From on or about April 26, 2017 to on or about April 27, 2017, in the Northern District of Mississippi and elsewhere, defendants MARIO D. COLLINS and PAULETTE M. CLAYTON, and others known and unknown to the Grand Jury, knowingly and intentionally conspired and agreed with each other to unlawfully seize, confine, inveigle, decoy, kidnap, abduct and carry away a person, Victim 1 ("O.V.") and hold Victim 1 for the purpose of Victim 1 committing commercial sex acts with the defendants intending to financially benefit from the commercial sex acts performed by Victim 1, and willfully transported Victim 1 in interstate commerce, traveled in interstate commerce and used facilities and instrumentalities of interstate commerce in furtherance of the commission of the kidnapping in violation of Title 18, United States Code, Sections 1201 (a)(1).

**Manner and Means**

2. It was part of the conspiracy that PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, received monies and other things of value by having Victim 1 engage in commercial sex acts.

3. It was further part of the conspiracy that MARIO D. COLLINS and PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, transported and arranged for the transportation of Victim 1 from Atlanta, Georgia to Memphis, Tennessee and then to Oxford, Mississippi in order for Victim 1 to engage in commercial sex acts.

4. It was further part of the conspiracy that MARIO D. COLLINS and PAULETTE M. CLAYTON used violence and the threat of violence to prevent Victim 1 from escaping the trip to Oxford, Mississippi.

5. It was further part of the conspiracy that PAULETTE M. CLAYTON and others known and unknown to the Grand Jury, used vehicles, public highways, hotels, telephones and the internet to facilitate the kidnapping.

**Overt Acts**

6. During and in furtherance of the conspiracy and to affect the objects of the conspiracy, at least one of the co-conspirators committed at least one of the following overt acts on or about the dates listed.:

a. On or about April 26, 2017, PAULETTE M. CLAYTON purchased a bus ticket for Victim 1 to travel from Atlanta, Georgia to Memphis, Tennessee.

b. On or about April 27, 2017, PAULETTE M. CLAYTON posted pictures of Victim 1 on [www.backpage.com](http://www.backpage.com) advertising commercial sex with Victim 1.

c. On or about April 27, 2017, MARIO D. COLLINS met PAULETTE M. CLAYTON and Victim 1 in order to transport them to Oxford, Mississippi in his vehicle.

d. On or about April 27, 2017, during the trip to Oxford, Mississippi, Victim 1 objected to performing commercial sex acts and asked to be taken home. In response to Victim 1's request to be taken home, PAULETTE M. CLAYTON threatened to throw Victim 1 out of the vehicle and run her over.

e. On or about April 27, 2017, during the trip to Oxford, Mississippi, Victim 1 objected to performing commercial sex acts and asked to be taken home. In response to Victim 1's request to be taken home, MARIO D. COLLINS placed a gun to Victim 1's head and threatened Victim 1, preventing Victim 1 from escaping the trip to Oxford, Mississippi.

f. On or about April 27, 2017, PAULETTE M CLAYTON rented a room at the University Inn in Oxford, Mississippi in order for Victim 1 to engage in commercial sex acts. All in violation of Title 18, United States Code, Section 1201(c).

### **COUNT THREE**

On or about April 27, 2017, in the Northern District of Mississippi and elsewhere, MARIO D. COLLINS, defendant, did knowingly and intentionally use, carry and brandish a firearm, to wit: a Smith and Wesson model SD 40 pistol, during and in relation to a crime of violence, namely a conspiracy to commit kidnapping, in violation of 18 U.S.C. § 1201(c), as alleged in Count Two of this indictment, for which the defendant may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

### **COUNT FOUR**

#### **(Transportation to Engage in Prostitution)**

7. On or about April 27, 2017, in the Northern District of Mississippi and elsewhere, defendants MARIO D. COLLINS and PAULETTE M. CLAYTON, aided and abetted by each

other and others known and unknown to the Grand Jury, did knowingly and intentionally Transport Victim 1 ("O.V.") in interstate commerce, from Georgia to Tennessee to Mississippi, with intent that Victim 1 engage in prostitution and sexual activity for which a person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2 and 2421.

**A TRUE BILL**

*/s/signature redacted*

**FOREPERSON**



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**ACTING UNITED STATES ATTORNEY**